

**UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF PENNSYLVANIA**

LIBERTY RESOURCES, INC.; DISABLED
IN ACTION OF PENNSYLVANIA, INC;
PHILADELPHIA ADAPT; TONY BROOKS;
LIAM DOUGHERTY; FRAN FULTON; and
LOUIS OLIVO;

Plaintiffs,

-against-

THE CITY OF PHILADELPHIA,

Defendant.

Case No. 2:19-cv-03846

**DECLARATION OF MATTHEW
PILLISCHER IN SUPPORT OF
PLAINTIFFS' OPPOSITION TO
DEFENDANT'S MOTION *IN LIMINE***

Judge: Honorable Harvey Bartle III

I, Matthew Pillischer, hereby declare:

1. I make this declaration based on my personal knowledge, and if called to testify, I could and would do so as follows:

2. I am over 21 years of age and live in Norristown, Pennsylvania. I work as a part-time assistant at the law office of David Ferleger.

3. I do not have a disability affecting my mobility and am not a Class member in this case.

4. In October 2021, I visited a number of intersections along Adams Avenue, Bleigh Avenue, W. Montgomery Avenue, and N. 20th Street in Philadelphia.

5. At each intersection that I visited, I took a photograph of the full intersection and a photograph of the pedestrian facilities at each corner.

6. On October 12, 2021 I visited Adams Avenue & Horrocks Street and took the photographs Bates stamped as P001897–1900 and attached hereto as Exh. 1.

7. On October 12, 2021 I visited Adams Avenue & Church Street and took the photographs Bates stamped as P001901–05 and attached hereto as Exh. 2.

8. On October 19, 2021 I visited Bleigh Avenue & Pennway Street and took the photographs Bates stamped as P001906–07 and P001910 and attached hereto as Exh. 3.

9. On October 19, 2021 I visited Bleigh Avenue & Montour Street and took the photographs Bates stamped as P001911–15 and attached hereto as Exh. 4.

10. On October 19, 2021 I visited Bleigh Avenue & Tabor Avenue and took the photographs Bates stamped as P001916–20 and attached hereto as Exh. 5.

11. On October 19, 2021 I visited Bleigh Avenue & Bingham Street and took the

photographs Bates stamped as P001921–25 and attached hereto as Exh. 6.

12. On October 19, 2021 I visited Bleigh Avenue & Rising Sun Avenue and took the photographs Bates stamped as P001926–30 and attached hereto as Exh. 7.

13. On October 26, 2021 I visited W. Montgomery Avenue & N. Lambert Street and took the photographs Bates stamped as P001931–32 and P001935–39 and attached hereto as Exh. 8.

14. On October 26, 2021 I visited W. Montgomery Avenue & N. 21st Street and took the photographs Bates stamped as P001940–44 and attached hereto as Exh. 9.

15. On October 26, 2021 I visited W. Montgomery Avenue & N. Van Pelt Street and took the photographs Bates stamped as P001945–49 and attached hereto as Exh. 10.

16. On October 26, 2021 I visited W. Montgomery Avenue & 22nd Street and took the photographs Bates stamped as P001950–54 and attached hereto as Exh. 11.

17. On October 26, 2021 I visited W. Montgomery Avenue & Judson Street and took the photographs Bates stamped as P001955–59 and attached hereto as Exh. 12.

18. On October 26, 2021 I visited Montgomery Avenue & N. 24th Street and took the photographs Bates stamped as P001960–64 and attached hereto as Exh. 13.

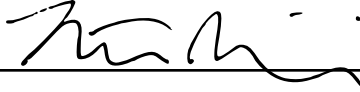
19. On October 26, 2021 I visited Montgomery Avenue & Bambrey Street and took the photographs Bates stamped as P001965–69 and attached hereto as Exh. 14.

20. On October 27, 2021 I visited S. 20th Street & Morris Street and took the photographs Bates stamped as P001975–79 and attached hereto as Exh. 15.

21. On October 27, 2021 I visited S. 20th Street & Montrose Street and took the photographs Bates stamped as P001980–84 and attached hereto as Exh. 16.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on January 10, 2022 in Norristown, Pennsylvania.

A handwritten signature in black ink, appearing to read "Matthew Pillischer", is written over a solid black horizontal line.

Matthew Pillischer

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LIBERTY RESOURCES, INC, et al.,

Plaintiffs,

v.

THE CITY OF PHILADELPHIA

Defendant

Case No. 2:19-cv-03846

CERTIFICATE OF SERVICE

I hereby certify that the foregoing **DECLARATION OF MATTHEW PILLISCHER**
IN SUPPORT OF PLAINTIFFS' OPPOSITION TO DEFENDANT'S MOTION IN
LIMINE is hereby filed electronically and available for viewing and downloading from the ECF
system; and has been served on Defendant's counsel by ECF's electronic notification today,
January 12, 2022.



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**Admitted Pro Hac Vice*